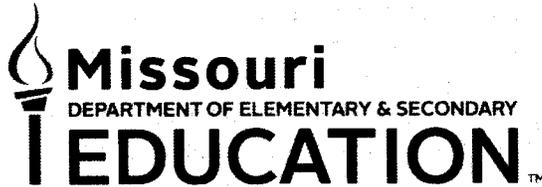


OCT 17 2013

FCC Mail Room

Chris L. Nicastro, Ph.D. • *Commissioner of Education*205 Jefferson Street, P.O. Box 480 • Jefferson City, MO 65102-0480 • [dese.mo.gov](http://dese.mo.gov)

October 1, 2013

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: FCC's Notice of Proposed Rulemaking to Modernize the E-rate Program for Schools and Libraries, WC Docket No. 13-184

Dear Ms. Dortch:

The Missouri Department of Elementary and Secondary Education (DESE) has oversight of the state's 560 public K-12 school districts/local education agencies (LEA), located in over 2,000 school buildings. More than 900,000 students are served through Missouri's public schools.

Missouri's public schools rely on E-rate discounts to support the technological and connectivity needs of their educational communities. E-rate funding has allowed schools to begin building technology infrastructure; however, technology infrastructure and connectivity are still inadequate in many of our schools, especially in rural parts of the state. Modern infrastructure and connectivity are needed to provide 21<sup>st</sup> Century teaching and learning for students.

DESE has recently reviewed the comments of the "Education Coalition," which includes the Council of Chief State School Officers, and agrees with their six reform principles to guide the Commission's efforts to modernize E-rate that will better serve the needs of all U.S. students.

- E-rate reform needs to be in place before the 2014-2015 school year.
- E-rate funding rules need to allow for flexibility to allow states and local communities to shape their own network and technology needs to support digital learning.
- E-rate is one component, a critical component, to the much broader impact on 21<sup>st</sup> Century teaching and learning in the digital age.
- The E-rate application process must be simplified.
- E-rate reform must allow for innovation and new models of 21<sup>st</sup> Century learning for the future, not to only meet today's needs.
- E-rate reform should ensure schools have the level of connectivity mandated by the Communications Act in a manner that encourages programmatic fiscal discipline, and that it must be reasonable, efficient and effective.

DESE recognizes the great value of the E-rate program and the utilization of E-rate funding throughout Missouri's public schools. We believe a strengthened E-rate program and updates will be instrumental to Missouri's ability to ensure access to affordable and high quality broadband to all our public schools. We see the need, now, as well as in the future for innovative teaching methods through technology.

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The technology challenges the state and our LEAs are facing today, include:

- Sufficient access to high speed Internet
  - Needed to expand the range of academic supports
  - Cost prohibitive in many areas of Missouri
  - Limited access in many areas of Missouri
- Methods of delivery
  - Fiber-optic networks
  - Alternative delivery methods
- Increased access to student devices
  - Technology platforms like digital textbooks
  - Individualized learning and interactive elements
- School infrastructure
  - Wireless capacity
  - Internal school district networks
- Educator professional development to utilize technology most effectively

DESE also supports an increase in the annual E-rate funding. E-rate program funding should be concentrated toward core broadband connection and network infrastructure. The impact of E-rate funding would be even more powerful if the funding flowed directly to the state education agency so that the resources are allocated to the schools most in need.

Thank you for the opportunity to comment on the proposed reforms to the E-rate program.

Sincerely,



Chris L. Nicastro  
Commissioner of Education